



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 21, 2018

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Ciminelli, Aiello, & Gerardi*, S2 16 Cr. 776 (VEC)

Dear Judge Caproni:

In an order dated December 12, 2018, the Court directed that, should parties be unable to come to a resolution regarding outstanding forfeiture issues, the Government must submit a brief in support of its application for forfeiture no later than January 11, 2019; the defendants must respond no later than January 25, 2019; and the Government must reply no later than February 1, 2019. In order to permit the parties to continue discussions regarding forfeiture and to seek to resolve the issue without further litigation, the parties respectfully request that the deadline for the Government's brief be adjourned to February 8, 2019; the deadline for the defendants' responses be adjourned to February 22, 2019; and the deadline for the Government's reply be adjourned to March 1, 2019. *See* Fed. R. Crim. P. 32.2(b)(1)(C) & (e)(1) (providing that a general order of forfeiture may be amended at any time).

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
Janis Echenberg / Robert Boone
David Zhou / Matthew Podolsky
Assistant United States Attorneys
(212) 637-2597/2208/2438/1947

cc: Counsel of record (via ECF)